

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

**KIMBERLY LADEHOFF and
THE VILLAGE OF LOMBARD, an Illinois
Municipal Corporation,**

Plaintiffs,

v.

GLENN CARTER,

Defendant.

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Case No: 08 CV 2077

Judge Lefkow

**Plaintiffs Demand
Trial By Jury**

MOTION FOR DEFAULT JUDGMENT

Now Come Plaintiffs, Kimberly Ladehoff, by and through her attorneys Arnstein & Lehr LLP, and the Village of Lombard, an Illinois Municipal Corporation, by and through its attorneys, Klein, Thorpe and Jenkins, Ltd. and as their Motion for Default Judgment pursuant to Rules 12 and 55 of the Federal Rules of Civil Procedure states the following:

1. On April 11, 2008, Plaintiffs filed the Complaint in this case.
2. On May 28, 2008, Defendant, Glenn Carter, was served with the summons and Complaint.
3. Pursuant to Federal Rule 12 (a)(1)(A), unless otherwise provided by statute or rule, a defendant shall serve an answer within 20 days after being served with a summons and complaint.
4. As of the date of the filing of this motion, Defendant has failed to answer or otherwise respond to the Plaintiffs' Complaint and has not filed an appearance in the case.
5. Pursuant to Rule 55 of the Federal Rules of Civil Procedure, when a party against whom judgment for affirmative relief is sought has failed to plead or otherwise defend, the Court may enter a default judgment.

6. Plaintiffs request that this Court set the matter for hearing on the default judgment for a prove-up of Plaintiffs' damages, including but not limited to costs for service of summons in accordance with Rule 4(d)(2) of the Federal Rules of Civil Procedure and all damages requested in Plaintiffs' Complaint.


WHEREFORE, Plaintiffs, Kimberly Ladehoff, and the Village of Lombard, an Illinois Municipal Corporation, pray that the Court enter a default judgment against Defendant, Glenn Carter, set the matter for hearing and for any further relief the Court deems appropriate.

KIMBERLY LADEHOFF

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